

In the Matter of RM-11338

I am George Gibson a broadcast engineer.

I have read many of the comments from the over 500 submitted in this matter. I find that entities such as NPR have raised some serious concerns over the NAB proposal. They say that with so many Am stations on the air it would be hard to pass out so many translator permits with the current backlog in place for pending FM to FM service.

These concerns carry merit. I think the FCC will have some problems being able to handle the current load of requests along with a new batch. But I join the majority of comments stating that AM does need relief.

I would state that we should first look at single owner stand alone stations for translator awards. While many Class B stations and hundreds of Class C stations need relief also, I think the first to get the new frequencies should be the true daytime stations and those with very low night power. These would be much easier to handle then trying to do a major overhaul and include the same power day night stations on the six local frequencies. I think they need the relief but it would be much harder to supply under the current circumstances . Some of these stations are in metro areas and fm is already scare.

The Commission should take this task on by dealing with daytimers only and then taking another look at relief for others. And those daytimers getting g the first round of help must be stand alone. Larry Langford had a good criteria for that in his comments. The owner may not have an FM with a overlap of its 60dbu contour to the AM stations 2mv/m even if the station has different city of license. But above all first priority should go to the AM station owners who are daytime stations and have NO other broadcast interests outside of the AM band. The actual number of stations that qualify under this rule is much less than the 5000 mentioned in the NPR comments.